

Remarks

As stated above, the Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the following remarks.

In the subject application, claims 14-20, 25, 28, and 31-45 are pending. Claims 14, 25, 28, and 31 are independent claims, and claims 15-20 and 32-45 are dependent. Applicants respectfully submit that since claims 1-13, 21-24, 26-27, and 29-30 were cancelled in response to the Restriction Requirement of September 11, 2008, Applicants are not required to reproduce the text of those claims in the listing of claims above. Applicants have made no amendment to the claims.

Claim Rejections – 35 U.S.C. § 103

Claims 14-15, 19-20, 25, 28, 31-33, 37-40, and 44-45 stand rejected to under 35 U.S.C. § 103(a) as being unpatentable over Ghoneimy (U.S. Patent Application Publication No. 2004/0078373, hereinafter "Ghoneimy") in view of Rice (U.S. Patent Application Publication No. 2002/0174010, hereinafter "Rice"). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Ghoneimy and Rice, whether viewed separately or in combination, do not disclose each and every limitation of Applicants' independent claim 14. Applicants' independent claim 14 is provided below for the Examiner's convenience:

14. (Original) A system of administrator tools for defining a subscription in a workflow, enterprise and mail-enabled application server, comprising:

a developer defined template file of design elements initializing design of said subscription;

a server side user interface responsive to said template file for defining an offline configuration document for said subscription; and

a server side user interface responsive to said template file for defining offline security for said subscription. (See Applicants' claim 14, as filed).

Applicants respectfully submit that Ghoneimy does not disclose either (i) "a developer defined template file of design elements initializing design of said subscription" or (ii) "a server side user interface responsive to said template file for defining an offline configuration document for said subscription".

First, it is Applicants' understanding that the Examiner believes Ghoneimy discloses "a developer defined template file of design elements initializing design of said subscription" at paragraph [0041]. See the subject action, page 3. Paragraph [0041] of Ghoneimy is provided below for the Examiner's convenience:

[0041] When the workflow system starts executing, three objects are available from the naming service: Document/Directory (DD) framework 20, (DMS) adapter 22, and DS adapter 24. The DD Adapter is two adapters rolled into one: the (DMS) adapter and the DS adapter. The DS and (DMS) are autonomous, i.e., exist separate from each other. The structure of the DD framework allows for the (DMS) and DS to be from different vendors. For example, splitting the DS from the (DMS) allows for the use of an Exchange directory with a Lotus (DMS). **The purpose of a (DMS) is for centralized "check-in and check-out" storage of documents. The (DMS) is used to store forms, attachments, and templates.** The DD Adapter uses the DS to authenticate users and perform role resolution. In the preferred embodiment, supported products include: Lightweight Directory Access Protocol (LDAP) through Java Native Directory Interface (JNDI), Microsoft Exchange.TM., and Microsoft NT.TM. User Registry. (See Ghoneimy, as published, paragraph [0041]; emphasis added).

Applicants respectfully submit that the "forms, attachments, and templates" of Ghoneimy are not the same as "a developer defined template file of design elements initializing design of said subscription" as recited in Applicants' independent claim 14. Applicants respectfully submit that paragraph [0041] of Ghoneimy merely discloses templates stored in a DMS, or document management system. The DMS of Ghoneimy appears to be used only to store templates and allow them to be checked in or checked out. Applicants respectfully submit that the templates

stored in the DMS of Ghoneimy are not understood to teach "a developer defined template file of design elements initializing design of said subscription".

For example, Applicants respectfully submit that the templates stored in the DMS of Ghoneimy do not appear to include "design elements initializing design of said subscription". Applicant is unable to understand how templates stored in a DMS initialize anything, let alone the "design of said subscription" as recited in Applicants' claim 14. The "subscription" of Applicants' claim 14 is described at, for example, paragraphs [0140] and [0167], and Figure 8 of the subject application, as published. Paragraphs [0140] and [0167], and Figure 8 of the subject application, as published, are provided below for the Examiner's convenience:

[0140] This invention provides an API for Notes for off-line operation. A preferred embodiment of this invention provides a web site with custom DLLs for delivery with iNotes. The iNotes programs are delivered to offline clients along with subscriptions. The preferred embodiment of this invention also provides server extensions (custom code) for download with iNotes. **A subscription is, in accordance with an exemplary embodiment of the invention, a secured (that is, ACL protected) database or collection of databases containing off-line web applications with synchronization schedules and with which an authorized user may interact, either on-line or with an off-line instantiation.** (See the subject application, as published, paragraph [0140]; emphasis added).

[0167] In accordance with the preferred embodiment of the invention, subscription 136 includes subscription main database 140, required databases 142, and optional databases 144. These databases represent a collection of off-line applications with which authorized users may interact at client 100. (See the subject application, as published, paragraph [0167]).

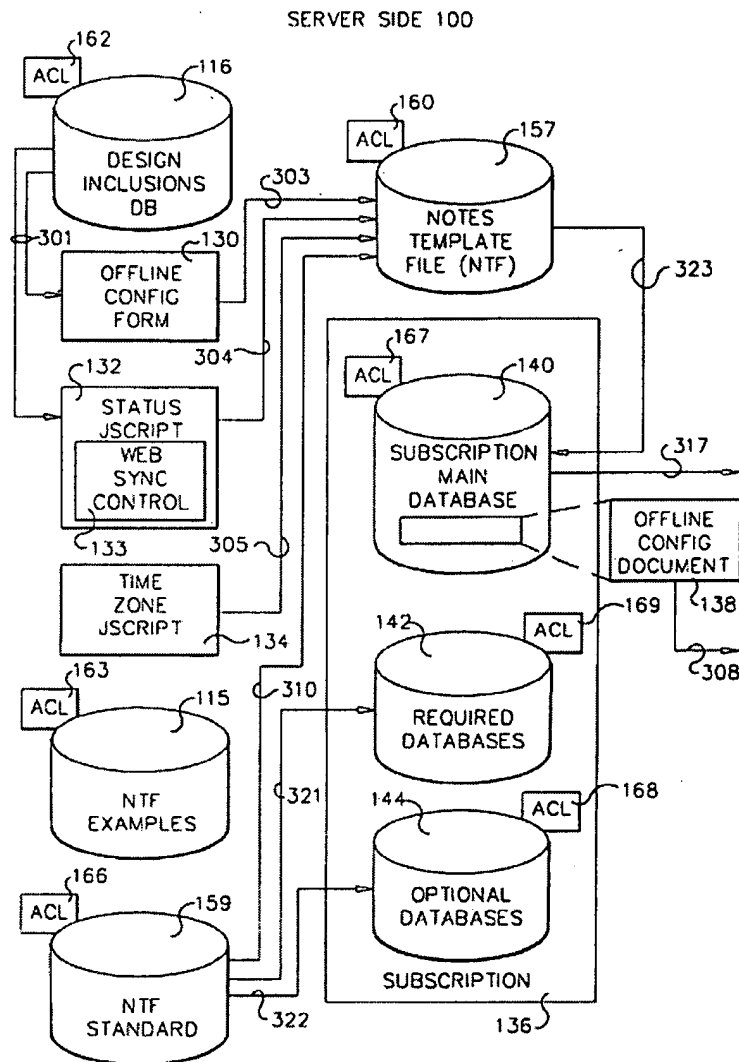


FIG. 8

As shown in the paragraphs and Figure above, Applicants' "subscription" (136) is "a secured (that is, ACL protected) database or collection of databases containing off-line web applications with synchronization schedules and with which an authorized user may interact, either on-line or with an off-line instantiation". Further, Applicants' subscription may include a number of databases which include off-line web applications. Applicants respectfully submit Ghoneimy's templates stored in a DMS do not teach "a developer defined template file of design

elements initializing design of said subscription" given that "subscription" must be read in light of, at least, the passages and Figure above.

Further, it is Applicants' understanding that the Examiner believes Ghoneimy discloses "a server side user interface responsive to said template file for defining an offline configuration document for said subscription" at paragraph [0069]. *See* the subject action, page 3. Paragraph [0069] of Ghoneimy is provided below for the Examiner's convenience:

[0069] Both processes and activities may be active. An active process or activity is one that is awaiting human response. **Many process instances can be active at any one time and can be created from the same or different plan templates. Process templates can be edited offline and can be dynamically edited online.** Process change control dynamically updates process instances and plan templates. The process instances continue to be related to the plan template from which they were created, thereby allowing a user to modify a plan template in run time by modifying the characteristics of a process instance. A process instance can be used to create a personal template. The platform independent nature of the CORBA interface and the JAVA language within the embodied workflow architecture enables process instances to be on many different computer platforms and enables the dynamic modification of both the process instances and the plan templates. Since the workflow system is not tied to any one computer system, the workflow system does not place any size restrictions on template and process sizes. (*See* Ghoneimy, as published, paragraph [0069]; emphasis added).

Applicants respectfully submit that the "[p]rocess templates [which] can be edited offline and can be dynamically edited online" of Ghoneimy are not the same as "a server side user interface responsive to said template file for defining an offline configuration document for said subscription". In contrast to Ghoneimy's templates, which can merely be edited offline, Applicants' template file "defin[es] an offline configuration document for said subscription." Applicants are unable to understand where Ghoneimy discloses template files which can "defin[e] an offline configuration document for said subscription", let alone an "offline configuration document" at all. Applicants' "offline configuration document" is described at, for example, paragraph [0170] and Figures 16-20 of the subject application, as published. Paragraph

[0170] and Figure 16 of the subject application, as published, are provided below for the

Examiner's convenience:

[0170] Configuration document 138 includes the names and locations of required databases 142 and optional databases 144, default configuration settings including properties of the subscription 136, the file sets 124 needed for offline execution, the default scheduling properties for synchronization which effect execution of service manager 218 and synchronization task 220 in the end user usage scenarios (yet to be discussed), and the look and feel of download page 230 when it displays in a browser 244. Many or all of these properties could be preset as part of the design found in template file 157. (See the subject application, as published, paragraph [0170]; emphasis added).

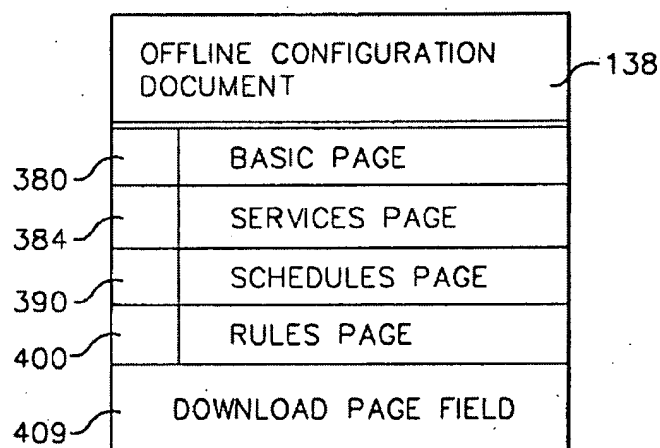


FIG. 16

As shown in the passage and Figure above, Applicants' "offline configuration document" includes, at least, "the names and locations of required databases 142 and optional databases 144, default configuration settings including properties of the subscription 136, the file sets 124 needed for offline execution, the default scheduling properties for synchronization which effect execution of service manager 218 and synchronization task 220 in the end user usage scenarios". See the subject application, paragraph [0170]. Applicants' are unable to see how Ghoneimy's templates, which can merely be edited offline, teach "a server side user interface responsive to

said template file for defining an offline configuration document for said subscription", where

"offline configuration document" must be read in light of, at least, the passage and Figure above.

Additionally, Applicants remind the Examiner that Applicants do not understand Ghoneimy to teach Applicants' "subscription", as discussed above. Therefore, Applicant respectfully submit that Ghoneimy does not teach "a server side user interface responsive to said template file for defining an offline configuration document for said subscription".

Accordingly, Applicants respectfully submit that Ghoneimy and Rice, whether viewed separately, or in combination, do not disclose either (i) "a developer defined template file of design elements initializing design of said subscription" or (ii) "a server side user interface responsive to said template file for defining an offline configuration document for said subscription". Therefore, Applicants' respectfully submit that the references cited do not disclose each and every limitation of Applicants' independent claim 14. As such, Applicants respectfully submit that independent claim 14 is in condition for allowance. Since independent claims 25, 28, and 31 include similar limitations to that of independent claim 14, Applicants respectfully submit that independent claims 25, 28, and 31 are in condition for allowance as well. Further, since the remaining claims depend from either independent claim 14 or 31, Applicants respectfully submit that those claims are in condition for allowance also. As such, withdrawal of the rejection to claims 14-20, 25, 28, and 31-45 under 35 U.S.C. § 103(a) is respectfully requested.

Having overcome all of the outstanding rejections, Applicants respectfully submit that the subject application is now in condition for allowance. Applicants believe that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for

patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

In light of the above-described remarks, Applicants respectfully assert that the subject application is in condition for allowance. While Applicants respectfully assert that the subject application is now in condition for allowance, the Examiner is invited to telephone Applicants' attorney (617-305-2143) to facilitate prosecution of this application. Please apply any charges or credits to deposit account 50-2324.

Respectfully submitted,

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